



April 26, 2017



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I am writing on behalf of the 116 year old Greater Stockton Chamber of Commerce. We represent multiple and varied businesses that will be directly impacted by the Delta Tunnels project, referred to by the Delta Stewardship Council as new conveyance.

We believe that in these proposed policy amendments before the Delta Stewardship Council a huge and irresponsible mistake is being made. There is nothing in the 2009 legislative mandate from the Delta Reform Act that gives the Council the authority to "promote" options for improved conveyance. We understand that the Delta Stewardship Council is to execute via state policies the co-equal goals of restoring, protecting and enhancing the Delta's ecosystem while improving water supply reliability, with the caveat that this will be accomplished by reducing reliance on the Delta.

If the Council embarks on promoting options for improved conveyance, the Council will be increasing reliance on the Delta and undercutting its own legislated mandate. In addition, the Delta tunnels, if permitted, would come before the DSC as a covered action that must be evaluated as being consistent with the Delta Plan. How can the Council promote the Delta tunnels and evaluate their merit, or lack thereof, in a judicious manner simultaneously?

Intelligent, responsible and honest concerns strongly believe proposed action are a direct conflict of interest for the DSC, The DSC should distance itself from encouraging or promoting any particular option so as to preserve its impartiality when considering conveyance- or storage-related covered actions. Its statutory mandates to use best available science, reduce Delta reliance, and achieve the coequal goals, among others, must still be applied to the review and evaluation of such covered actions under the Delta Reform Act.

In closing, the Delta Stewardship Council is supposed to function as a steward of the Delta. It can only do so by maintaining its neutrality and independence when evaluating proposed projects that will radically alter water flows, water quality and water quantity.

Thank you,

Douglass W. Wilhoit, Jr  
CEO, Greater Stockton Chamber of Commerce &  
Former San Joaquin County Supervisor (1979-1995)